IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF TENNESSEE

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SNMP RESEARCH, INC. and SNMP RESEARCH INTERNATIONAL, INC., Plaintiffs,	: Case No. 3:20-cv-00451-CEA-DCP : U.S. District Judge Charles E. Atchley, Jr.
V.	: :
BROADCOM INC.; BROCADE COMMUNICATIONS SYSTEMS LLC; and EXTREME NETWORKS, INC.,	: : :
Defendants.	; ; v

EXTREME NETWORKS, INC.'S RESPONSE TO SNMP RESEARCH, INC'S MOTION FOR LEAVE TO FILE DOCUMENTS UNDER SEAL

Extreme Networks, Inc. ("Extreme") respectfully submits this response to SNMP Research, Inc.'s ("SNMP") Motion for Leave to File Documents Under Seal (ECF No. 97) ("Motion") pursuant to procedural requirement number two (2) in this Court's Memorandum and Order Regarding Sealing Confidential Information (ECF No. 11).

SNMP's Motion seeks leave to file redacted versions of SNMP's Memorandum of Law in Support of Plaintiff's Motion to Compel Discovery Responses (ECF No. 96-1), Exhibit C to the Declaration of Olivia Weber (ECF No. 96-5), and Exhibit P to the Declaration of Olivia Weber (ECF No. 96-18). SNMP also seeks to file under seal Exhibit K to the Declaration of Olivia Weber (ECF No. 96-13), which is Extreme's Second Supplemental Responses and Objections to SNMP's First Set of Interrogatories, dated August 27, 2021.

While Extreme appreciates SNMP's accommodation of provisionally sealing information Extreme designated as Confidential pursuant to the parties' Agreed Protective Order (ECF No. 93) and "information belonging to Defendant Extreme which Plaintiff has designated as Confidential in an abundance of caution" (ECF No. 97 at 1), in light of the guidance in the Court's Memorandum and Order that "the parties are strongly encouraged to be very selective in the information they seek to seal" (ECF No. 81 at 3), Extreme does not join in SNMP's request to seal the information identified as Confidential to Extreme.

Furthermore, SNMP seeks leave to redact a pricing term found on page 3 of Exhibit C to the Declaration of Olivia Weber. Extreme does not oppose SNMP's request that this information be sealed, but Extreme does not independently request that it be sealed.

DATED: Palo Alto, California October 18, 2021

Respectfully Submitted,

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

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Attorneys for Extreme Networks, Inc.

CERTIFICATE OF SERVICE

I hereby certify that Extreme Networks, Inc.'s Response to SNMP Research, Inc.'s Motion for Leave to File Documents Under Seal is being served on all counsel of record in the above-captioned litigation via electronic filing on this 18th day of October, 2021.

/s/ John M. Neukom
John M. Neukom

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